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25 UNITED STATES DISTRICT COURT
26 NORTHERN DISTRICT OF CALIFORNIA
27 SAN JOSE DIVISION

28 CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all other
similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER REQUIRING
GOOGLE TO PRODUCE NON-PUBLIC
SOURCE CODE (DISPUTE P14)**

[PROPOSED] ORDER

Before the Court is Plaintiffs' request for an Order requiring Google to produce non-public source code (Dispute P14). Having considered Plaintiffs' request, and good cause having been shown, the Court **GRANTS** Plaintiffs' request and **ORDERS** as follows:

By August 26, 2021, Google will produce non-public source code showing how Google maps logged-out browsing activity with device and publisher identifiers, including source code showing how Google tracks users across websites and devices for advertisement conversions.

Google will produce the non-public source code at a location of Google's choosing.

Google may supervise access to this source code by Plaintiffs' counsel and experts.

Google will also in advance provide Plaintiffs' counsel and experts with documents sufficient to guide their inspection of the source code.

Production of non-public Google source code will be subject to the terms of the parties' Stipulated Protective Order (Dkt. No. 81).

This relief does not foreclose Plaintiffs from seeking access to additional aspects of non-public Google source code.

IT IS SO ORDERED.

DATED: _____

Honorable Susan van Keulen
United States Magistrate Judge